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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY



February 25, 1993

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

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In the matter of )  
)  
Notice of Proposed Rulemaking )  
Replacement of Part 90 by Part 88 )  
to Revise the Private Land Mobile )  
Radio Services and Modify the )  
Policies Governing Them )

PR Docket No. 92-235

Dear Ms. Searcy:

### COMMENTS OF PACIFICORP

Pursuant to Section 1.415 of the Commission's Rules, PacifiCorp hereby respectfully submits its comments on the Notice of Proposed Rulemaking (NPRM), FCC-92-235, published November 6, 1992, in the above captioned matter.

#### I. Introduction

PacifiCorp is a public utility engaged in the generation, transmission, and distribution of electrical energy for use by the general public in the states of Washington, Oregon, California, Idaho, Montana, Wyoming, and Utah.

PacifiCorp operates an extensive land mobile communication system which is essential to the reliable and safe operation of the company's electrical system. Wide area dispatch communications are particularly critical for the timely maintenance and restoration of electrical service. We are operating approximately 200 fixed base stations and an estimated 4,000 mobile and portable units in the VHF (150-160 MHz) band. In addition we operate

about 800 mobile and portable units in the UHF (450-470 MHz) band mainly at our steam electric generating plants. We also use several data links in the 154-173 MHz band.

PacifiCorp has chosen to maintain its mobile operations in the VHF band to take advantage of the propagation characteristics needed to cover our diverse service territory. The majority of our service territory is sparsely populated which makes wide area coverage important in order to most efficiently use the limited frequencies. Wide area coverage is difficult due to the wide variety of topography encountered in our area. Several studies have shown that the best frequency band to use to achieve the required coverage is highband VHF (150-174 MHz).

PacifiCorp is presently in the process of implementing mobile repeater operation which will improve mobile coverage for company users. A common system is used for all areas, metropolitan and rural, to allow vehicles to move around within the company's service territory without the need for multiple radios in each vehicle. This common system is essential during emergency restoration operations.

## II. Impact of proposed rules on mobile operations - Power/Height Limitations

If implemented as proposed, PacifiCorp will be required to reduce power on most base stations to five watts. There will be a reduction of approximately 60 % in mobile coverage by reducing the occupied bandwidth and limiting the allowed transmitter power as proposed in the first phase of the implementation schedule. The decreased coverage resulting from the power reduction will require the construction of additional sites just to maintain the existing coverage. PacifiCorp operates in many environmentally sensitive areas where building permits are difficult and sometimes impossible to obtain. In addition, even if the

The Commission should not consider the use of an available spectrum based on the narrow perspective that all mobile communication needs are equal. Rather, the Commission should recognize that different users require different access to that spectrum. A traditional dispatch type of operation may not be the appropriate mode of operation for some users; however, it is essential to others.

#### IV. Frequency splitting/frequency blocks

PacifiCorp is very concerned that the narrower channel spacing will result in considerably more intermodulation problems and harmful interference at most communication sites. It is imperative that site management guidelines and resolution methods be provided so that problems can be addressed.

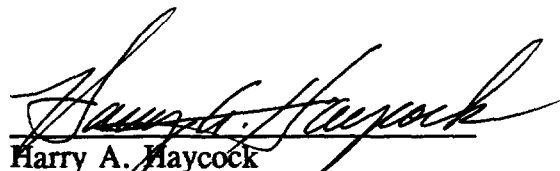
PacifiCom is also concerned that the narrow channels will eliminate tone coded

## V. Conclusion

PacifiCorp urges the Commission to proceed cautiously before making overly restrictive changes to the use of the available spectrum to avoid compounding the problems that are already present in the band. PacifiCorp respectfully requests the Commission to consider these Comments in acting on the subject Notice of Proposed Rule Making.

Respectfully submitted,  
PacifiCorp

By:

  
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